

Jahan C. Sagafi (SB# 224887)
Rachel W. Dempsey (SB# 310424)
Laura Iris Mattes (SB# 310594)
OUTTEN & GOLDEN LLP
One California Street, Suite 1250
San Francisco, California 94111
Telephone: (415) 638-8800
Facsimile: (415) 638-8810
E-Mail: jsagafi@outtengolden.com
E-Mail: rdempsey@outtengolden.com
E-mail: imattes@outtengolden.com

Nancy L. Abell (SB# 088785)
PAUL HASTINGS LLP
515 South Flower Street
Twenty-Fifth Floor
Los Angeles, California 90071-2228
Telephone: (213) 683-6000
Facsimile: (213) 627-0705
nancyabell@paulhastings.com

Rachel M. Bien (SB# 315886))
OUTTEN & GOLDEN LLP
601 S Figueroa St., Suite 4050
Los Angeles, CA 90017
Telephone: (323) 673-9900
Facsimile: (646) 509-2058
E-mail: rmb@outtengolden.com

Paul W. Cane, Jr. (SB# 100458)
PAUL HASTINGS LLP
101 California Street
Forty-Eighth Floor
San Francisco, California 94111
Telephone: (415) 856-7000
Facsimile: (415) 856-7100
paulcane@paulhastings.com

Attorneys for Plaintiffs and Settlement Class Members

Additional counsel listed on signature page

*Attorneys for Defendant
UBER TECHNOLOGIES, INC.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

ROXANA DEL TORO LOPEZ and ANA
MEDINA, on behalf of themselves, and all
others similarly situated,

Plaintiffs,

vs.

UBER TECHNOLOGIES, INC.,

Defendant.

Case No. 4:17-cv-06255-YGR

**STIPULATION REQUESTING
APPOINTMENT OF SPECIAL
MASTER**

1 In accordance with the Parties' Settlement Agreement, ECF No. 61-1, § 4.1, which was
 2 granted Final Approval by this Court in its November 14, 2018 order, ECF No. 72, Plaintiffs
 3 Roxana del Toro Lopez and Ana Medina ("Plaintiffs") and Defendant Uber Technologies, Inc.
 4 ("Defendant") respectfully submit the following Stipulation Requesting Appointment of Special
 5 Master for purposes of implementation of the programmatic relief set forth in the Settlement. The
 6 parties declare in support of this request:

7 WHEREAS, on November 14, 2018, the Effective Date, the Court granted final approval
 8 of the Settlement Agreement between the Parties, ECF No. 72;

9 WHEREAS, the Settlement Agreement provides for the appointment of a Special Master
 10 to resolve any disputes regarding compliance with the terms of the Agreement, Settlement
 11 Agreement § 4;

12 WHEREAS, the Settlement Agreement requires that that Parties jointly request Court
 13 approval of Fred Alvarez as Special Master, Settlement Agreement § 4.1; and

14 WHEREAS, Mr. Alvarez is exceptionally qualified for this role, since (1) he has served as
 15 the Assistant Secretary of Labor and as a Commissioner of the United States Equal Employment
 16 Opportunity Commission, (2) he has several decades of experience in the private practice of
 17 employment law, (3) he has served as a Monitor or Special Master in a wide variety of
 18 employment discrimination class action settlements, overseeing implementation of programmatic
 19 relief similar to that being implemented here, including *Gonzalez v. Abercrombie & Fitch Stores,*
 20 *Inc.*, Nos. 03-cv-2817-SI, 04-cv-4730-SI, and 04-4731-SI (N.D. Cal.); *Ellis v. Costco Wholesale*
 21 *Corp.*, No. 04-cv-3341-EMC (N.D. Cal.); *Jaffe v. Morgan Stanley DW, Inc.*, No. 06-cv-03903-
 22 *TEH* (N.D. Cal.); *EEOC v. Texas Roadhouse, Inc.*, No. 11-cv-11732 (D. Mass); *EEOC v. Darden*
 23 *Restaurants, Inc.*, No. 15-cv-20561 (S.D. Fla.); *Tucker v. Walgreen Company*, No. 05-cv-00440
 24 (S.D. Ill.); and *August-Johnson v. Morgan Stanley DW, Inc.*, No. 1:06-cv-01142 (D.D.C.); and (4)
 25 he is a Fellow of the College of Labor and Employment Lawyers, a non-profit professional
 26 association honoring the leading lawyers nationwide in the practice of Labor and Employment
 27 Law. Fellows are recognized as distinguished members of the labor and employment legal
 28 community who promote achievement, advancement, and excellence in the practice by setting

standards of professionalism and civility, by sharing their experience and knowledge, and by acting as a resource for academia, the government, the judiciary, and the community at large. His Jones Day law firm webpage (<https://www.jonesday.com/falvarez/>, attached hereto as **Exhibit A**) provides further details regarding his experience and qualifications.¹

THEREFORE, the parties respectfully request that the Court appoint Mr. Alvarez as Special Master pursuant to the Settlement Agreement, § 4.

Dated: December 18, 2018

By: /s/ Jahan C. Sagafi

Jahan C. Sagafi

Jahan C. Sagafi (Cal. Bar No. 224887)
 Rachel W. Dempsey (SBN 310424)
 Laura Iris Mattes (SBN 310594)
 OUTTEN & GOLDEN LLP
 One California Street, Suite 1250
 San Francisco, CA 94111
 Telephone: (415) 638-8800
 Facsimile: (415) 638-8810
 E-Mail: jsagafi@outtengolden.com
 E-Mail: rdempsey@outtengolden.com
 E-mail: imattes@outtengolden.com

Rachel M. Bien (SB# 315886)
 OUTTEN & GOLDEN LLP
 601 S Figueroa St., Suite 4050
 Los Angeles, CA 90017
 Telephone: (323) 673-9900
 Facsimile: (646) 509-2058
 E-mail: rmb@outtengolden.com

Adam T. Klein (admitted pro hac vice)
 OUTTEN & GOLDEN LLP
 685 Third Avenue, 25th Floor
 New York, New York 10017
 Telephone: (212) 245-1000

By: /s/ Nancy L. Abell

Nancy L. Abell

Nancy L. Abell (SBN 088785)
 PAUL HASTINGS, LLP
 515 S Flower Street
 Twenty Fifth Floor
 Los Angeles, CA 90071
 Telephone: (213) 683-6000
 Facsimile: (213) 627-0705
 Email: nancyabell@paulhastings.com

Paul W. Cane, Jr. (SBN 100458)
 PAUL HASTINGS, LLP
 101 California Street
 Forty-Eighth Floor
 San Francisco, CA 94111
 Telephone: (415) 856-7000
 Facsimile: (415) 856-7100
 Email: paulcane@paulhastings.com

¹ Effective January 1, 2019, Mr. Alvarez will be joining the law firm of Coblenz, Patch, Duffy & Bass LLP as a Partner. Uber is a client of Coblenz, Patch, Duffy & Bass LLP in certain non-employment law-related matters. Mr. Alvarez will recuse himself from providing any employment law advice to Uber during the pendency of his appointment as Special Master, and he has assured the Parties that any work on this matter will not be influenced any way by whatever relationship Coblenz, Patch, Duffy & Bass LLP has or will have with Uber.

Facsimile: (646) 509-2060
E-mail: atk@outtengolden.com

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ECF ATTESTATION

I, Jahan C. Sagafi, am the ECF User whose ID and password are being used to file the foregoing Stipulation. In compliance with Local Rule 5-1(i)(3), I hereby attest that Defendant's counsel, Nancy L. Abell, has concurred in this filing.

Date: December 18, 2018

By /s/ Jahan C. Sagafi
Jahan C. Sagafi

Class Counsel